

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

LEISA GROVES,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 6:20-cv-03414
)	
KENT INTERNATIONAL INC.,)	JURY TRIAL DEMANDED
WAL-MART STORES EAST, L.P., and)	
WALMART, INC.,)	
)	
Defendants.)	

NOTICE OF REMOVAL

COME NOW Defendants, WAL-MART STORES EAST, L.P., AND WALMART, INC., by and through their attorneys, BETH C. BOGGS and BOGGS, AVELLINO, LACH & BOGGS, L.L.C., pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1446, and for their Notice of Removal, state to the Court as follows:

1. This action entitled Leisa Groves v. Kent International Inc., Wal-Mart Stores East, L.P., and Walmart, Inc., was commenced in the Circuit Court of Taney County on or about November 2, 2020.
2. The attached Petition was served upon Wal-Mart Stores East, L.P., on December 1, 2020.
3. The Plaintiff is a citizen and resident of Taney County, Missouri. See Petition, ¶ 1.
4. Defendant, Wal-Mart Stores East, L.P., is a Delaware limited partnership having its principal place of business in the State of Arkansas. The members of the limited

partnership are citizens of the State of Arkansas. Thus, for purposes of diversity, Defendant, Wal-Mart Stores East, L.P., is a citizen of Delaware and Arkansas.

5. Defendant, Kent International Inc., has its principal place of business in Parsippany, New Jersey, and is incorporated in the State of Delaware. For purposes of jurisdiction, Defendant, Kent International Inc., is a citizen of Delaware and New Jersey.

6. Defendant, Walmart, Inc., has its principal place of business in Arkansas. It is incorporated in the State of Delaware. Thus, for purposes of diversity, Defendant, Walmart, Inc., is a citizen of Delaware and Arkansas.

7. Defendants assert that complete diversity exists, as Defendants are citizens of New Jersey, Delaware, and Arkansas, for purposes of federal jurisdiction. See 28 U.S.C. § 1332(c)(1).

8. This is an action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332, in that the matter in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00, and is between citizens of different states. The Plaintiff claims injuries from a bike accident. Among Plaintiff's claim is a traumatic brain injury.

9. Copies of all processes, pleadings, orders, records, and proceedings in Taney County are attached to this Notice of Removal.

10. Defendants have filed this Notice of Removal within thirty (30) days after the service of the Petition, from which it was first ascertained that the case was removable.

WHEREFORE, Defendants, Wal-Mart Stores East, L.P., and Walmart, Inc., respectfully request that this Court acknowledge jurisdiction over this action and allow removal thereto to this Court for determination of all issues involved herein.

DEFENDANTS DEMAND TRIAL BY JURY

Respectfully submitted,

**WAL-MART STORES EAST, L.P.,
and WALMART, INC.**

By: /s/ Beth C. Boggs
Beth C. Boggs, #43089MO
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed with the Clerk of the United States District Court, Western District of Missouri, by using the Court's CM/ECF Electronic Filing System this 29th day of December, 2020, with an electronic copy to be served by e-mail upon the following:

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